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ABSTRACT

The Bureau of Indian Affairs (B.I.A.) estimates that as of January, 1978, about $300 million would be needed to renovate or construct school facilities for Indian children. The B.I.A. could save millions of Federal dollars by enforcing its policy of having Indian children attend nearby public schools when adequate facilities exist and by establishing and enforcing the policy of requiring attendance at nearby B.I.A. schools with available space, instead of renovating old schools or constructing new ones. Also, there exists no formal policy regarding the size of B.I.A. schools. Prior to construction, the B.I.A. should compare the cost (and cultural and academic benefits) of building more, smaller, scattered schools, as desired by the tribes and the B.I.A. Director of Education, against building fewer, more economically operated, centrally located larger schools. Finally, the 1979 B.I.A. school construction priority list is unreliable because it was developed without necessary planning data; B.I.A. did not verify data submitted on school construction applications, and policy concerning attendance boundaries is unclear. The B.I.A. should require comprehensive planning data, verify application data, and clarify attendance boundary policies before establishing a priority list of facilities needed to meet educational needs of Indian children. (SB)

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REPORT OF THE COMPTROLLER GENERAL OF THE UNITED STATES

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Questionable Need For All Schools Planned By The Bureau Of Indian Affairs

U.S. DEPARTMENT OF HEALTH, EDUCATION & WELFARE
NATIONAL INSTITUTE OF EDUCATION

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The Bureau of Indian Affairs could save millions of Federal dollars by

- following its policy of having Indian children attend nearby public schools instead of renovating old schools or constructing new facilities;
- constructing larger, consolidated Bureau schools in lieu of smaller, scattered ones which are much more expensive to operate; and
- requiring Indian students to attend nearby Bureau schools with available space instead of constructing additional Bureau schools.

Further, the Bureau's system to set priorities for constructing school facilities is based on invalid information, and the priority list developed for fiscal year 1979 is unreliable. To correct this deficiency, the Bureau needs to obtain comprehensive information on the school needs of Indian children, determine whether existing Bureau and public schools can meet these needs, and prepare a priority list of facilities needed to meet the needs of Indian children.

CED 78-55

FEBRUARY 15, 1978

ED168788

RC 011268

COMPTROLLER GENERAL OF THE UNITED STATES
WASHINGTON, D.C. 20548

B-114868

The Honorable Robert C. Byrd, Chairman
Subcommittee on the Department of
Interior and Related Agencies
Committee on Appropriations
United States Senate

Dear Mr. Chairman:

This is one of a series of reports in response to your request of August 9, 1977, asking us to make a comprehensive review of some of the Bureau of Indian Affairs programs and processes. This report points out how the Department of the Interior can improve its management to save funds and insure that Bureau of Indian Affairs schools are planned for construction on the basis of priority needs.

In accordance with a request from your office, we have not obtained written agency comments. However, we have informally discussed our findings with agency officials, and their comments have been considered.

As agreed with your office, unless you publicly announce its contents earlier, we plan no further distribution of the report until 10 days from the date of the report. At that time, we will send copies to interested parties and make copies available to others upon request.

Sincerely yours,

Elmer B. Staats

Comptroller General
of the United States

COMPTROLLER GENERAL'S REPORT TO THE SUBCOMMITTEE ON THE DEPARTMENT OF INTERIOR AND RELATED AGENCIES, SENATE COMMITTEE ON APPROPRIATIONS

QUESTIONABLE NEED FOR ALL SCHOOLS PLANNED BY THE BUREAU OF INDIAN AFFAIRS

D I G E S T

The Bureau of Indian Affairs estimated that as of January 1978 about $300 million would be needed to renovate or construct school facilities for educating Indian children.

Much of this expenditure could be avoided if Indian children enroll in nearby Bureau or public schools. If new school facilities are needed in some locations, the Bureau could save money by constructing larger, centrally located schools rather than smaller, scattered schools with less enrollment.

Also, the Bureau had not developed comprehensive planning information on the school needs of Indian children and therefore could not readily determine size and location of school facilities--when or where they were needed.

SCHOOLS SCHEDULED FOR CONSTRUCTION NOT NEEDED

The Bureau's policy states that wherever adequate school facilities are available, Indian children shall be enrolled in local public schools. However, GAO reviewed justifications for 19 planned Bureau schools and found that adequate public school space was already available in 12 of the localities. These 12 planned schools are estimated to cost about $42 million. (See p. 5.)

The Chief of the Bureau's Division of School Facilities told GAO he was aware that he was not following the Bureau's formal policy. However, he was uncertain of the impact of the Indian Self-Determination and Education Assistance Act on school construction requests.

Tear Sheet. Upon removal, the report cover date should be noted hereon.

The Director of Indian Education, Bureau of Indian Affairs, agreed that schools which are not needed according to Bureau policy should not be included in construction plans. They should be identified and eliminated before the Bureau places them on a priority list. This policy should be enforced.

NEED TO ESTABLISH POLICY REQUIRING ATTENDANCE IN AVAILABLE, NEARBY BUREAU SCHOOLS

The Bureau has no policy concerning the need for additional Bureau schools when space is available in its existing nearby schools. (See p. 11.) One proposed school GAO reviewed is included on the Bureau's priority list even though a nearby Bureau school has available space.

A Bureau school in Acomita, New Mexico, with a capacity for 650 students has only about 300 in attendance and is about 12 miles from the area to be served by the proposed Laguna Middle School for 200 students.

A Bureau School Facilities official said he was aware of the nearby Acoma School being less than half full. However, he stated that the Bureau has no policy concerning a tribe's entitlement to a school if a nearby Bureau school has available space.

THE BUREAU NEEDS TO DETERMINE COSTS AND BENEFITS OF SCHOOL SIZES

The Bureau has no formal policy on the size of schools; therefore, Indian tribes have requested the construction of numerous small schools instead of more economically operated, centrally located larger schools. (See p. 12.)

San Juan and Santa Clara Pueblos in New Mexico are only 6 miles apart and their schools have only 77 and 96 students, respectively. Each community, however, wants its own school, believing that without the school the community may die.

A Bureau official told GAO that the optimum school capacity in terms of operating cost is 500 students. The Director of Indian Education, however, said that the smaller schools provide more effective education; he would like to make such schools Bureau policy.

If this policy is formally established, GAO believes the number of small schools requested in the future could significantly increase as would operational costs. Larger schools offer more diversified programs and activities; the per-pupil cost is lower in most cases than at smaller schools; and more services can be provided for the same cost.

BUREAU SCHOOL CONSTRUCTION PRIORITY LIST NOT RELIABLE

The construction priority system for fiscal year 1979 was based on the number of unhoused children within a defined attendance boundary and the conditions of existing facilities. However, there are weaknesses in the implementation of the Bureau's system to set school construction priorities. (See p. 15.)

GAO found that:

--The fiscal year 1979 school construction priority list was developed without needed comprehensive planning data, such as projected enrollments, demographic data, and assessments of existing facilities.

--Data submitted on school construction applications was not verified by the Bureau.

--The Bureau does not have clear policies on attendance boundaries that are crucial for projecting student enrollment.

As a result, an accurate determination of what school facilities are needed to meet the educational needs of Indian children is virtually impossible to make. Until these matters are satisfactorily resolved, little, if any, reliability can be placed on the validity of priority lists developed under the system.

OTHER FACTORS INFLUENCING BUREAU SCHOOL CONSTRUCTION DECISIONS

Bureau officials said that traditionally the Congress has added funds or included in its construction budget mandatory provisions for planning and designing Federal school facilities. Tribes and the Bureau interpret this as top or near top priority for actual construction even though other projects may merit earlier consideration. (See p. 23.)

Bureau officials said that such political influence on the size and priority of schools built was applied regardless of Bureau policies and/or opinions. This has resulted in school construction of lower priority or of excessive size. (See p. 23.)

NEEDED AGENCY ACTIONS

GAO recommends that the Secretary, Department of the Interior,

--compare the costs and cultural and academic benefits of constructing small, scattered schools as opposed to larger, centralized schools before schools are scheduled for construction.

GAO further recommends that the Secretary, Department of the Interior, direct the Assistant Secretary for Indian Affairs to

--enforce the Bureau's policy of having Indian children attend nearby public schools where adequate facilities are available,

--establish a policy which would require use of available space in nearby Bureau schools before new schools are built,

--require comprehensive planning data to justify school construction priorities,

--require verification of data on all construction request applications before including them on school construction priority lists, and

--clarify and enforce the Bureau's policies on school attendance boundaries.

FORMAL REVIEW AND COMMENTS NOT OBTAINED

At the request of the Chairman, Subcommittee on the Department of Interior and Related Agencies, Senate Committee on Appropriations, GAO did not submit this report to the Department of the Interior for formal review and comments. However, responsible agency officials were provided copies of the report and their informal comments have been considered. These officials generally agreed with GAO's conclusions and recommendations. The Bureau of Indian Affairs Director of Indian Education told GAO that he has proposed or is going to propose that action be taken on all of GAO's recommendations.

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ABBREVIATIONS

GAO	General Accounting Office
BIA	Bureau of Indian Affairs
CEP	Comprehensive Education Plan
HEW	Department of Health, Education, and Welfare

CHAPTER 1

INTRODUCTION

On August 9, 1977, the Chairman, Subcommittee on the Department of Interior and Related Agencies, Senate Committee on Appropriations, requested that we make a comprehensive review of some of the Bureau of Indian Affairs (BIA) programs and processes and report the results to him by February 15, 1978. This is one of a series of reports in response to that request. This report presents the results of our evaluation of BIA's method of setting school construction priorities.

BIA SCHOOL CONSTRUCTION PROGRAM

Indian leaders and Government officials have recognized that education is a key element to solving many problems faced by Indians. In 1975 the Congress declared that a major national goal is to provide the quantity and quality of educational services and opportunities which will permit Indian children to compete in the careers of their choice.

Federal funds are authorized to construct schools for BIA-operated, contract and previously private schools, and public schools which house Indian students. The Snyder Act of 1921 (25 U.S.C. 450h (Supp. V)) authorizes funds for Federal schools operated by BIA. The Indian Self-Determination and Education Assistance Act (Public Law 93-638) authorizes funds for schools formerly operated by BIA but now under contract to the tribe. Public schools near or on reservations that serve Indian students attending them may receive Federal funds from the Department of Health, Education, and Welfare (HEW) under authority of 20 U.S.C. 631 et seq. and from BIA under 25 U.S.C. 458 (Supp. V 1975).

In the past, BIA selected schools for construction through a Board of Review consisting of four BIA officials. These officials were to select a project according to their judgment of need.

BIA's Division of School Facilities under its Office of Indian Education provides, among other things, technical assistance in coordinating long-range plans for construction and in establishing criteria for the design of school space. It maintains liaison with BIA's Division of Facilities Engineering under its Office of Administration. This Division provides architectural and other technical services

related to the construction of new facilities. It also provides technical services to tribes on design and construction of new facilities including schools.

For fiscal year 1977 BIA developed a priority list that recognized those facilities that were unsafe, unsanitary, or otherwise inadequate. According to BIA officials this system turned out to be too judgmental and vague to be meaningful. For fiscal year 1978 a scoring system was used that gave a point value for each school requested. For example, a school that had been destroyed would receive a score of 500 and a school that was determined to be unsafe or unsanitary would receive a score of 400. BIA found faults with this system among which included too much emphasis placed upon facility conditions rather than on unhoused pupils.

The present method used for the fiscal year 1979 priority list (see app. I) is based on both the number of unhoused children within a defined attendance boundary and the condition of existing facilities. BIA emergency projects (those units destroyed by a natural disaster or fire) are handled outside the priority system. For our observations on this system see pages 15 and 16.

HEW has also developed a school construction priority list for schools affected by any Federal activity, such as military bases or Indian reservations. Although the HEW and BIA lists could be combined, BIA officials stated that the various funding authorizations and limitations make combining these lists impractical. Officials from both agencies said that HEW-funded State schools are constructed according to basic educational requirements. The BIA schools serve not only the students but the entire community. The BIA school is the focal point around which the community revolves.

As of December 1977 the BIA student enrollment system was reporting a membership of 41,548 elementary and secondary students in the 205 Bureau-operated schools and other schools whose operations are contracted by BIA to tribes or other groups. This total included 18,562 boarding students and 22,986 day students. BIA also operates 16 dormitories for 2,568 students attending public schools. In addition, BIA operates eight postsecondary schools with a total enrollment of 1,420.

Appropriations for Indian education during fiscal year 1977 totaled about $244 million, of which about $157 million was appropriated for BIA school operations. The remaining $87 million was for assistance to Indians in non-Federal schools, adult education, and higher education. In addition,

about $15 million was appropriated in fiscal year 1977 for BIA school construction. However, according to the Director of Indian Education, BIA had a backlog of about $300 million in school construction as of January 1978.

SCOPE OF REVIEW

We examined reports and documents and interviewed BIA officials, BIA and public school administrators, and tribal officials concerning the adequacy of the current system for setting school construction priorities. We also reviewed applicable laws, regulations, policies, procedures, and practices at the headquarters offices, various area and agency offices, and schools. We did not review the effectiveness of the education provided by BIA schools.

Our review was carried out at BIA headquarters offices in Washington, D.C., and Albuquerque, New Mexico; at area offices located in Albuquerque; Billings, Montana; and Phoenix, Arizona; and at 19 sites where schools were planned for construction. (See app. I.) Our field work was done in October and November 1977. At the conclusion of our work, we provided copies of our report to responsible Department of the Interior officials, and their oral comments have been considered.

CHAPTER 2

QUESTIONABLE NEED FOR MANY SCHOOLS ON PRIORITY LIST

BIA ranked some schools high on its 1979 school construction priority list that should not be built. According to BIA policy, the students should go to nearby public schools. Also, BIA has no policies regarding building schools when nearby BIA schools are available or building smaller, scattered schools as opposed to larger, centrally located schools. As a result, operational efficiency is not being achieved.

Part II, Section 101.03, of the Bureau of Indian Affairs Manual dated December 8, 1953, states that "wherever adequate school facilities are available, Indian children shall be enrolled in local public schools." More specifically, Section 201 of the manual dated February 6, 1952, states that "wherever public schools enrolling non-Indian children are within normal transporting distance of Indian homes, every effort shall be made to enroll Indian children in these schools." BIA has defined normal transporting distance as within an hour's bus ride from a student's home to school. BIA has no policy requiring Indian students to attend nearby BIA schools.

The current Director of BIA's Office of Indian Education stated that the above policies are still current and should be followed.

The Office of Management and Budget used BIA policy regarding public school availability when it denied funding in fiscal year 1975 to construct a replacement school at San Felipe, New Mexico. The Office of Management and Budget stated that the facility would take Indian children out of existing public schools.

BIA POLICY ON ATTENDANCE AT PUBLIC SCHOOLS NOT FOLLOWED IN SCHEDULING SCHOOLS FOR CONSTRUCTION

We reviewed the justifications and visited localities for 19 planned BIA schools--3 for which funding was committed before BIA's current priority system was developed. BIA has included the remaining 16 of the schools on its priority list for fiscal year 1979. (See app. I.) We found that 12 of the 19 schools should not be built under BIA's existing policy concerning attendance at public schools when available.

The students for the 12 planned schools, which we believe should not be built, estimated to cost over $42 million, by the Division of School Facilities based on fiscal year 1978 dollars, reside within an hour's bus ride from a public school. Driving time ranged from 5 to 55 minutes. According to the public schools' respective officials, space is available at these neighboring schools to handle the additional students. The following schedule lists each of the 12 schools, its estimated cost, its ranking on the BIA priority list, and the distance from the approximate general location of the students who would attend the planned BIA school to the nearest public school with available space.

School	BIA priority list ranking	Estimated cost (millions)	Approximate distance from the general location of student's residence to public school (note a) (miles)
Red Rock (note b)	2	$ 2.0	29
San Simon	14	4.0	30
San Felipe	5	4.0	12
Salt River	28	3.5	10
Northern Cheyenne (note c)	7	6.0	22
Bullhead	13	3.0	18
Little Eagle	15	3.0	10
Jemez	(d)	8.0	4
Santa Clara	16	2.0	3
Moenkopi	25	3.0	2
Canoncito	18	3.0	30
San Juan	27	1.0	1
Total cost		$42.5	

a/Driving time ranged from about 5 to 55 minutes.

b/Some of these students could be enrolled in a nearby public school and some at a BIA school.

c/No existing Northern Cheyenne high school.

d/Construction already started.

Students BIA believes would attend one of the planned schools are now attending nearby public, tribally operated,

or mission schools. Mission shools are schools operated by religious groups funded primarily by contributions. The remaining 11 schools are planned to serve students now attending BIA schools that the tribes would like to replace. These schools were built before current policies--some in the early 1900s--when other facilities, such as public schools, were not available.

Not replacing BIA schools when public schools are available will obviously save construction and operating funds if the BIA schools scheduled for replacement are closed. However, it should be noted that these savings will be offset somewhat because the students will then most likely enroll in public schools. Under the Johnson-O'Malley Act (25 U.S.C. 52), as amended, BIA reimburses public schools to provide special supplemental programs for eligible Indian children. However, according to BIA, only about half of the Indian students attending public schools receive Johnson-O'Malley funds. HEW through impacted area aid (20 U.S.C. 238 (Supp. V 1975)) provides additional funds to public schools to offset the loss of tax revenue from nontaxable Indian land.

Although we did not compute the overall savings to the Federal Government, we believe millions in construction funds plus some operational funds could be saved. The average per-pupil Johnson-O'Malley Act BIA payment for fiscal year 1977 was about $1,300. HEW impacted area aid average per-pupil payment for fiscal year 1977 was about $800. According to BIA, the overall per-pupil cost for fiscal year 1977 for BIA day schools was about $2,300, or a difference of $200 per pupil.

We discussed our findings with the Director of Indian Education who agreed that schools which are not needed according to current BIA policy should not be included in BIA's construction plans. He said these schools should be eliminated before BIA sets a priority rating on them. He added that he was already aware of this problem and that he recently told the Chief, Division of School Facilities, who is responsible for developing the priority list, to develop appropriate procedures to make certain that these policies are followed. He added, however, that this policy is currently being reviewed.

The procedures were drafted by the BIA Division of School Facilities in December 1977. BIA's Director of Indian Education told us that, before a BIA school construction project is placed on the priority list, BIA School Facilities personnel would fill out a prescreening data form. The form includes statistical data related to enrollment. However, it does not require information on available public school space

nearby. We discussed this matter with an official of School Facilities who agreed it should be included and stated it would be added to the form. He said that this procedure will definitely be implemented for the fiscal year 1980 priority list.

We believe, however, that even if the prescreening procedure is implemented and nearby public schools with available space are identified, BIA must still enforce its policies on the need to construct BIA schools in such areas. In this regard, the Chief of the BIA Division of School Facilities told us that he was aware that he was not following BIA's formal policy concerning planning to build BIA schools even though public schools were available nearby. Officials of the Division said they were aware that public schools were near the 12 schools we questioned. He explained, however, that BIA had not issued any formal interpretation on the impact of the Indian Self-Determination and Education Assistance Act on school construction requests. He further explained that it was his understanding that because of the act, BIA had informally established a very liberal policy concerning Indians' determining their own needs. He added that without a formal policy on the extent self-determination will be allowed to affect school construction decisions, dealing with the Indian people is very difficult. He stated that tribes argue that schools are needed because:

--The school gives the community an identity and without it the community may break up.

--Other public and Indian communities have their own school.

--The school is the major employer in the community.

The Director of Indian Education said that he did not agree with the Division of School Facilities understanding of the impact the act should have on school construction requests. He stated that the Indian Self-Determination and Education Assistance Act provides the authority for tribes to receive a contract to administer Federal schools and programs totally or in part. He indicated that the act should have very little, if any, impact on decisions such as where schools are located. We agree with the Director.

CASE EXAMPLES

Following are discussions of several planned schools which do not comply with BIA policy on attendance at nearby public schools when space is available. Twenty-eight of the 31 schools BIA plans to build are replacement schools.

Salt River Elementary School
Salt River Reservation, Arizona

Salt River Elementary School is number 28 on BIA's current priority list. (See photos on p. 9.) Its estimated cost is $3.5 million. According to the tribe's school construction application a new school is needed because the existing school is not able to adequately meet the education needs of students living on the reservation. For example, the school needs new plumbing, a gym, and more storage area. The existing school has about 200 students enrolled, but 215 elementary school students from the reservation go to Mesa, Arizona, public schools whose district includes the reservation.

The BIA school principal told us that the farthest point on the reservation to the nearest public school is only 10 miles, or a 15-minute drive. He further stated that if BIA fully implemented its current policy of sending Indian children to public schools within a 1-hour bus ride, then the Salt River School would not exist.

The Assistant Superintendent of the Mesa School District told us that his district could easily handle the additional enrollment if all of the Salt River students attended Mesa public schools and still be within the State maximum student-teacher ratio of 30 to 1. A Mesa school district principal said that his school has programs that are especially geared for Indian children, including

--a special bus for those children participating in after-school activities,

--an Indian club open to all children to learn more about the Indian culture,

--a full-time Indian counselor,

--an Indian aide to help students with reading and math problems,

--arts and crafts classes to help children use their hands, and

--special instructional days geared to educate children on the effects of Indians on our society.

Moenkopi School
Tuba City, Arizona

Moenkopi School is number 25 on BIA's school construction priority list with an estimated cost of $3 million.

The school is planned for 200 kindergarten through sixth grade students. Presently, there are only 56 students in the Moenkopi School which is for kindergarten through fourth grades. The main classroom building was built around 1930. BIA's facility inventory data shows that the school is in good condition with only normal maintenance required. According to the application submitted, the school is being requested because the tribe wants to have a facility large enough to educate over 100 students from the reservation who are now attending nearby Tuba City, Arizona, public schools.

The Moenkopi School is located at the edge of Tuba City, Arizona, which has a large and growing public school system. Tuba City public school officials told us they could easily include the Moenkopi students in their growing facilities.

San Juan School, San
Juan Pueblo, New Mexico

The San Juan School is number 27 on BIA's current priority list and is estimated to cost about $1 million. The main school facilities were built between 1922 and 1936. According to the principal of the present school, the facility is unsafe, unsanitary, and obsolete. The existing school has about 77 students and the new school is planned for 120 students.

A public elementary school is about 1/2 mile from the present BIA school. The public school principal told us that she could currently accommodate another 50 children and when a planned remodeling and expansion is completed in September 1978, she could handle more students. She told us that she believes if BIA and the school district worked together, the public schools could handle all of the San Juan Indian students.

San Felipe School
San Felipe Pueblo, New Mexico

San Felipe School is number five on BIA's school construction priority list. The tribe requested that a replacement school be built for 250 students from kindergarten through fourth grade. The tribe believed the existing facilities, which are temporary classrooms for 258 kindergarten through fourth grade students, were unsafe.

A Bernalillo County School official stated that there is space available for the San Felipe students at Bernalillo County Schools. These schools are located 12 and 15 miles, respectively, away from San Felipe, or about a 30-minute drive. These schools would be within BIA's policy of a 1 hour's bus ride from the student's residence to the school.

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Jemez School
Jemez, New Mexico

Jemez School for kindergarten through sixth grades is on BIA's current list of committed construction. The original school was built in the late 1800s when no other public schools were nearby. However, in 1972 the school burned down. Presently there are six temporary buildings in good condition for 109 students. The proposed project is being built for 220 students. Student population in the area is shared by Jemez BIA school, a mission school, and a public school. The public school is only 4 miles away and was built in 1956.

Its principal told us the school has space available for the children currently attending Jemez School. The present enrollment at the public school is 537, and it has a capacity for 1,000 students.

NEED TO ESTABLISH POLICY REQUIRING ATTENDANCE IN AVAILABLE NEARBY BIA SCHOOLS

One school we reviewed is included on BIA's priority list even though a nearby BIA school has available space. BIA has no policy concerning the need for additional BIA schools when space is available in existing BIA schools.

Three years ago a BIA school for grades kindergarten through eight was opened in Acomita, New Mexico. The school has a capacity of 650 students but currently has only about 300 in attendance. The school is about 12 miles from the area to be served by the proposed Laguna Middle School for 200 students estimated to cost about $2.8 million. We questioned officials of the tribe about the possibility of Laguna students attending the Acoma School and received strong opposition. The tribal officials said they did not believe the neighboring tribe would allow the Laguna children in the school. They further stated that their tribe would have to vote on whether they would even want their children to attend the school. They said relations between the tribes have not been good. However, in a neaby public school called Laguna-Acoma Jr.-Sr. High, Laguna and Acoma students attend together with no significant problems, according to the school's principal.

A BIA School Facilities official said he was aware the nearby Acoma School was less than half full. He stated, however, that BIA has no policy concerning whether a tribe should be entitled to a school if a nearby BIA school has available space. He stated that BIA only has a policy saying

that students must attend nearby public schools. Therefore, under the implications of the Indian Self-Determination and Education Assistance Act, School Facilities ranked the Laguna School 17 on its school construction priority list.

BIA NEEDS TO DETERMINE COSTS AND BENEFITS OF SCHOOL SIZES

BIA has no policy on the size of schools, and therefore Indian tribes have requested that BIA construct numerous small schools instead of more economically operated, centrally located larger schools.

For example:

--San Juan and Santa Clara Schools in New Mexico are numbers 27 and 16 respectively on the school construction priority list. Presently, 77 and 96 students attend San Juan and Santa Clara Day Schools, respectively. The two schools have projected enrollments of 120 and 180. Although neither school could presently accommodate the other, the two pueblos are only 6 miles apart. A BIA official told us each community, however, wants its own school, believing that without the school the pueblo may die.

--Bullhead and Little Eagle, both on the Standing Rock Reservation, are numbers 13 and 15 respectively on the school construction priority list. The schools have present enrollments of 85 and 96 students respectively for kindergarten through eighth grades. The proposed projects are for schools of 220 and 150 students. The two schools are 13 miles apart.

--Red Rock and Cove Schools on the Navajo Reservation are numbers 2 and 31 respectively on the school construction priority list. The present enrollment at each school is 100 and 126 respectively. Red Rock is a kindergarten through third grade facility, and Cove serves kindergarten through seventh grade. Red Rock is planning to increase its facility to a kindergarten through sixth grade school. At the Cove School only an expanded dining room facility and a new library were requested. With an upgraded road and expanded school facilities, Cove could accommodate some Red Rock students, resulting in the need for a smaller school at Red Rock.

A BIA headquarters official told us that according to BIA studies the optimum school capacity in terms of operating cost is around 500 students. For example, the average

per-pupil operating cost for one school of about 100 students is $3,000 as compared to one of 500 students whose per pupil operating cost is only slightly over $1,300.

The Director of Indian Education, however, believes that smaller schools provide more effective training as well as other cultural benefits and would like to make this formal BIA policy. Accordingly, BIA has not opposed small school construction in nearby areas.

We believe that if a small school policy is formally established, the number of schools requested in the future could significantly increase as would operational costs. Obviously, operating many small schools is not as efficient as operating fewer, somewhat larger schools. Also, larger schools generally can provide students more diversified programs and activities. Arts and crafts, culture courses, and gymnasiums are more apt to be included in larger schools. Because the per pupil cost at larger schools is lower in most cases than at smaller schools, more services can be provided for the same cost. However, because the decision to build smaller schools for somewhat improved education is a costly alternative, we believe Interior should develop cost-benefit data on building small schools in nearby areas before or if such a policy is formally adopted.

CONCLUSIONS

Many schools on BIA's priority list should not be built according to current BIA policy because available public schools are nearby. BIA has not complied with its own policy and has allowed these schools to be included in its construction plans. This noncompliance has resulted because BIA has allowed Indian tribes to greatly influence the decision to construct schools regardless of cost and compliance with policies. As a result, tribes have been able to persuade BIA officials to plan to construct schools which do not comply with existing policies and/or are of questionable need.

Also, BIA is planning to build schools even though available space exists in nearby BIA schools and is planning to build scattered, small schools rather than more efficient larger, centralized schools. No policies exist on either of these matters.

RECOMMENDATIONS TO THE SECRETARY OF THE INTERIOR

We recommend that the Secretary of the Interior

--compare the costs and cultural and academic benefits of constructing small, scattered schools as opposed

to larger, centralized schools before schools are scheduled for construction.

We further recommend that the Secretary of the Interior direct the Assistant Secretary for Indian Affairs to

--enforce BIA's policy of having Indian children attend nearby public schools when adequate facilities are available, and

--establish a policy which would require use of available space in nearby BIA schools before new schools are built.

CHAPTER 3

BIA SCHOOL CONSTRUCTION PRIORITY LIST NOT RELIABLE

As pointed out in chapter 2, many schools on BIA's school construction priority list should not be built. We also found basic weaknesses in the implementation of BIA's system to set school construction priorities. Until these implementation problems are resolved, little, if any, reliability can be placed on the validity of any priority list developed under the system.

CRITERIA FOR EFFECTIVE PLANNING

Vital to school management in meeting its established educational goals is a facilities planning process that systematically accumulates and reports essential information. An effective planning process should include

--describing facilities, equipment, pupil space, and other items required to implement approved educational programs;

--developing demographic data, such as birth rates, migration trends, and housing activity, needed to develop enrollment forecasts and facility requirements;

--accumulating information on student population projections by school planning areas;

--accumulating information on capacities and adequacies of existing facilities, including capacity changes that will come about as proposed in the approved capital improvement program;

--preparing areawide and systemwide analyses of student enrollment and building capacities, including assessing projected building needs; and

--developing and implementing a system to monitor the capital improvement program and its progress toward accommodating educational programs and goals.

Data produced from a system that includes these essential elements should help in making informed decisions on the location, type, number, and size of school buildings needed to achieve educational goals.

Generally, we believe that the construction priority system developed by BIA is consistent with the above criteria and, if properly implemented--including following

applicable policies as discussed in chapter 2--is an objective method to measure the need for schools. We believe, however, that the system was not implemented effectively. We found that:

--The fiscal year 1979 list was developed without needed comprehensive planning data.

--Data submitted on applications was not verified by BIA.

--To have an effective planning system, BIA will have to clarify and enforce policies on attendance boundaries.

NEED TO DETERMINE EDUCATIONAL NEEDS OF INDIAN CHILDREN

BIA's fiscal year 1979 priority list was developed without all needed comprehensive planning data. We discussed this matter with the Director of Indian Education and the Chief of the Division of School Facilities, who concurred that such comprehensive planning information is essential to determine actual school priorities. The Director explained that he had hoped to use such data in developing the fiscal year 1979 priority list. He said he has developed requirements for a Comprehensive Education Plan (CEP), the purpose of which is to (1) define educational needs and program requirements and (2) provide for the compilation, analysis, and integration of educational planning information with other relevant tribal, social, and economic planning data. He said that much of the information required by CEP is needed to develop a reliable priority list. More specifically, CEP would provide such needed information as (1) where every Indian child in the planning area is currently attending school, (2) attendance boundaries, (3) conditions of existing facilities, (4) demographic data such as birth rates, migration trends, etc., (5) student population projections, (6) student attendance distribution when the project is completed, and (7) determination of other available space.

The Director of Indian Education told us that the CEP information, however, was not developed and therefore all needed data was not used in developing the fiscal year 1979 priority list. He said instructions were sent to all Assistant Area Directors for Education in March 1976 to develop CEPs for those projects in their area for fiscal year 1979. He told us that the then Acting Commissioner of BIA, however, told them they did not have to follow the instructions because CEPs were not needed. CEP regulations have been drafted

for inclusion in Title 25, Part 39 of the Code of Federal Regulations. As of December 1977 they were being reviewed by the Assistant Secretary for Indian Affairs and the Department of the Interior's Solicitor's Office.

A November 1977 General Services Administration report on "BIA's Facilities Construction and Maintenance Program" noted that CEP "will go a long way towards resolving identification of project needs and establishing a standarized uniform plan development." BIA officials agreed that the CEP was needed for effective planning.

We recognize that the CEP requires the development of information which (1) may take years to develop and (2) may impact on the operation of education programs as well as the setting of school construction priorities. However, we believe that to establish a valid priority list, much of the information required by CEP will have to be developed and used regardless of whether the entire CEP is completed.

An example of the effect comprehensive planning data can have can be demonstrated by the lack of coordination we noted between BIA and other organizations responsible for educating Indian children in developing the fiscal year 1979 priority list. BIA, public schools, and mission schools sometimes did not communicate with each other and therefore were not aware of each other's construction plans. Even offices within BIA were not always aware of plan changes. Comprehensive educational planning must be accomplished with close coordination among all groups. If effectively implemented, the CEP should help rectify the lack of coordination that exists.

Following are examples we noted of the lack of coordination and its effect:

--BIA agency officials at Sells, Arizona, were unaware that BIA's San Simon School would not be completed for at least 5 years. Agency, tribal, and San Jose mission school personnel anticipated that the school would be completed in fiscal year 1979. They believed that the mission schoool would close as soon as San Simon was completed because it is inadequate and structurally hazardous. We were the first to inform them of their low status on the priority list. If the mission school closes, some of the Indian students will have to go to public schools in the Ajo School District. We were told by an Ajo School District representative that space is available in the schools. However, BIA personnel said that some Indians would

be reluctant to go to public schools because they believe they discriminate against Indians.

--The San Juan public elementary school in New Mexico plans to expand and remodel its school in September 1978. However, BIA has nearby San Juan School on its construction list. A public school official stated there was no exchange of information between BIA and public school officials. A BIA agency official said he thought the public school was closed. There will be space available for some of the 77 students attending the San Juan BIA School at the public school nearby when the addition is completed. The public school already has one-half of the elementary students on the reservation in attendance.

--The Jemez, New Mexico, BIA school will soon be built, but no one has notified the nearby mission school of the new school's size. A mission school official was surprised to learn from us that the BIA school is large enough to accommodate all the BIA students and all those from the mission school as well. The Jemez BIA school is expected to be constructed by 1979. The project will be for a planned student enrollment of 220. The present enrollment of the BIA school is only 109. Besides the mission school, which has 120 kindergarten through sixth grade students, there is a public school only 4 miles away. The public school has an enrollment of 45 Indian students in kindergarten through sixth grades. There are only about 320 students in the total elementary population of Jemez and if the mission school continues to operate, the BIA school may not appreciably increase its enrollment and will be overbuilt.

--A BIA middle school is planned in Laguna Pueblo, New Mexico. For several years the tribe has been attempting to get additional space for the Laguna children. The public school is currently on HEW's Office of Education school construction planning list for additional classroom space and the BIA school is on the BIA construction list. Both anticipate serving the same students.

--We discussed this matter with the superintendent of the Grants School District, who just became aware that BIA was also planning to build a school in Laguna. The HEW Office of Education in Washington also was not aware of the planned BIA school. Tribal officials said they simply want a school regardless of whether it is public or BIA.

Another type of problem caused by the lack of comprehensive planning data involves determining the condition of existing facilities. As part of the CEP a current evaluation of the condition of existing structures will be required. Such determinations were sometimes not made by qualified personnel for the requested replacement schools on the fiscal year 1979 priority list.

BIA used building condemnation as one means to assign priorities to projects on its school construction list. Condemned school facilities were determined by BIA to be of a higher priority. BIA evaluated the conditions of the existing school buildings on the basis of a computer printout developed annually by the Facilities Engineering Division. We found, however, that many of the evaluations by Facilities Engineering on the conditions of the facilities are not made by qualified engineers. We were also told by a BIA Division of Facilities Engineering official that because of the lack of engineers in the BIA area and agency offices, some of the information in the latest (August 1976) printout may be outdated.

We noted instances where because of the lack of concrete data on the condition of existing facilities, BIA may have improperly ranked school needs. For example, the Red Rock School, which is number two on the BIA priority list, was scored as being condemned but actually had not been. A BIA agency official stated that the building was considered condemned in determining Red Rock's priority because they "should be" condemned. We noted that BIA has not condemned any school on the priority list nor is there any existing BIA criteria to make that determination. When we talked with BIA officials responsible for condemning buildings, they were not aware of any BIA procedures issued for use when condemning a building. When we visited the Red Rock School, we noted that it was in poor condition. We believe, however, that BIA should make a structural evaluation before it concludes that a school should be condemned.

We also noted somewhat the reverse situation. Many of the proposed school construction projects have existing facilities classified by BIA as being in good condition with only normal maintenance required. However, we found that BIA's information may not be accurate. For example, BIA rated the San Juan School as structurally good with only normal maintenance required in August 1976. However, the agency engaged an engineering firm in 1977 to determine the condition of the school buildings. The firm's report noted that the buildings were in bad structural condition and should be replaced. This difference of opinion between BIA and the engineering firm on the actual condition

of the buildings should be resolved. A BIA official told us that the engineering firm's report was probably accurate because BIA's information was not provided by an engineer.

NEED TO VERIFY DATA JUSTIFYING CONSTRUCTION REQUEST

BIA received 31 applications for school construction projects to be included in its fiscal year 1979 school construction priority list. BIA verified the data on only one of the applications. We found that 14 of the 16 applications we reviewed were not properly scored on the basis of BIA criteria. Also, in some cases the information in the application as of the date it was submitted was not current and/or the criteria used to determine whether students are unhoused was misinterpreted. Unless the scoring and applications are accurate, BIA cannot have a meaningful priority list.

For example:

--The San Simon application which included a 160-bed dormitory, projected an enrollment of 440 students. However, now the tribe does not want boarding facilities. As a result, the projected enrollment should only be about 300. The dormitory plans were dropped because of the available BIA boarding school at Santa Rosa and because the school is planned to be built close to many students' homes. We found that in scoring the application, BIA considered the need for the dormitory, which caused the school's priority to be significantly higher than it should be.

--Bullhead, South Dakota, BIA school officials projected an enrollment of about 220 students on their application even though current enrollment is under 100 students. The number of children we estimated that would attend the Bullhead School was about 140 or 36 percent lower than the application. Our estimate was based on census data provided by the Standing Rock Office of Planning and Development.

--Red Rock, Arizona, BIA school project application was incorrect on the basis of the percentage of students considered unhoused. On the application all of the students considered to be attending Red Rock were considered as unhoused within the BIA area. We found, however, that the Nizhoni Public School, with 99 percent Indian enrollment and space available, was within an hour's bus ride for some of the students attending Red Rock. Accordingly, these students should have been considered housed. The Red Rock School ranking

on the priority list would be reduced because its priority application score should be lower.

--In Lame Deer, Montana, the Northern Cheyenne High School project application was correct at the time submitted on the basis of the percentage of students considered unhoused. Most of the students on the reservation were considered to be unhoused on the application. Subsequently, however, as a result of a nearby mission school located on the reservation changing its status to a BIA contract school for the upcoming semester, the percentage of unhoused students should be reduced. This school is within an hour's bus ride of many Northern Cheyenne students.

--The Taos, New Mexico School stated on its project application that all its children were unhoused within the community. However, the school is a permanent building that is neither condemned nor overcrowded. According to the school's principal, almost all of the children are housed in the Taos Pueblo School. The score, which was 355, should be reduced by 100 points because of the error, which would significantly lower the school on the priority list.

The Director of Indian Education and a BIA school facilities official agreed with our findings and stated that they recognize the importance of verifying data on all applications. They stated that staffing limitations as well as the tight time frame for developing the fiscal year 1979 priority list prevented them from performing the needed verification. They stated that in the future all applications would be verified before schools are included on the priority list.

NEED TO FURTHER DEFINE POLICY ON ATTENDANCE BOUNDARIES

One of the first considerations in establishing an effective school construction program is to accurately project student enrollment. However, we found that because Indian students have several options concerning which school they attend, it is very difficult for BIA to develop an effective construction planning system. This also affects the planning of nearby public school systems.

Part 62, Section 2.5 of the Bureau of Indian Affairs Manual, dated September 25, 1969, states that BIA's general policy is to "educate all students as close to their homes as possible." This policy could help to establish realistic attendance boundaries. However, when taken in consideration

with BIA's policy to educate students in public schools wherever adequate space is available plus the opportunities for parents to send their children to BIA boarding schools, estimating enrollment in a specific school is very difficult.

For example, a kindergarten through eighth grade school was built 3 years ago in Acomita, New Mexico. The school was built for 650 students but currently houses only about 300. Part of the low enrollment problem seems to be the option parents have of sending their children to other schools nearby. About 100 of the community's students are attending a nearby public junior-senior high which is overcrowded and 225 are being bussed to public schools about 20 miles away. The parents were allowed to choose which school their children would attend.

This problem is further compounded by the availability of boarding schools. For example, on the Hopi Reservation a junior-senior high school is being planned. Almost 900 students are projected to attend this school proposed for 1,300 students. One BIA School Facilities official, however, doubts that many children will attend the school. He said he believes that some parents may prefer to send their children to off-reservation boarding schools that the parents had previously attended.

BIA's policy on attending its boarding schools is to educate all students as close to their homes as possible. It further states that students shall not be enrolled in schools outside their attendance boundary when a school exists within the attendance boundary having a program and space to meet the student's needs. However, we found that BIA has not followed this policy.

In another review we made concurrently with this review, we found that little attention was paid to BIA's policy on boarding school attendance. For example, at three boarding schools we visited within the Anadarko Area Office about 42 percent of the students whose attendance applications we reviewed came from residences outside the Anadarko Area.

BIA is also not implementing its policy that Indian students attend the nearest schools. Consequently, parents may send their children to any BIA day, public, or boarding school. BIA is therefore unable to plan accurately for the size of a needed school, resulting in overutilized or underutilized facilities. Also, BIA's nearest school policy somewhat conflicts with its policy to educate children in public schools if available. If a BIA school is closer than an available public school, no policy exists to determine which school the student will attend. We believe until such

policy is developed, planning for school construction will remain difficult.

We discussed this matter with some public school officials who acknowledged that this problem makes their planning difficult. For example, a school district official in New Mexico told us that because BIA students within his public school district can go to whichever BIA or public school they wish, it is difficult to plan for school construction needs. He added that he never knows from year to year how many of the Indian children will be attending schools in his district.

BIA school construction officials agreed that a policy further clarifying attendance boundaries is vital to an effective planning system. The Director of Indian Education acknowledged that a problem exists.

OTHER FACTORS INFLUENCING BIA SCHOOL CONSTRUCTION DECISIONS

According to BIA officials, in the past Members of the Congress influenced both the size and priority of schools built. They told us that such actions influenced the design or construction of schools at Acoma, Chemawa, and Ramah. The officials stated that these actions were applied regardless of BIA policies and/or opinions and in many cases resulted in construction of lower priority schools or schools of excessive size.

BIA officials told us that traditionally, the Congress has added additional funds or included in the BIA construction budget mandatory provisions for the planning of a Federal school facility or the design of a facility, or both. This action is interpreted by tribes and BIA personnel as mandating top or near top priority for actual construction even though other projects may merit earlier consideration. The overall effect is to change priorities to accommodate the "add-ons" or to be criticized by Members of Congress, the tribes, or both.

We found two past studies that concluded that Members of Congress have influenced construction of BIA schools regardless of actual needs. A December 1976 Investigative Staff report of the House Committee on Appropriations, reprinted in fiscal year 1978 House Appropriations hearings on the Department of the Interior, concluded, among other things, that BIA did not have a viable, bureauwide priority system to effectively carry out its construction program. On the contrary, the system used has often been more responsive to congressional, social, and economic pressures than

to supported needs. A November 1977 General Services Administration management study report titled "Bureau of Indian Affairs School Facilities Construction and Maintenance Program" stated that "because of either a lack of adequate funding on projects, a lack of credibility in setting priorities on projects, or even more realistically, a concerted effort to have a facility need satisfied, local tribes have established a communication link with Members of Congress and as a result have obtained congressionally mandated funds for projects."

BIA officials stated that an example of past congressional influence on BIA school construction is the Acoma School in New Mexico. The school was built in 1975 for kindergarten through grade eight. The school has capacity for 650 students but an enrollment of about 300. It was built before BIA formalized its school construction priority system.

According to BIA officials, the tribe contracted for design on the school after it influenced congressional members to obtain funds for the design phase. The architects used the planning figures the tribe had arrived at and designed the school for 650 students. The BIA Division of School Facilities did not agree that the school should be built for that many students and questioned why it was being built before others which they believed to be of greater need. They said a public and mission school were nearby with space available. However, BIA officials said construction funds were appropriated again on the basis of another congressional "add-on" for a school of 650 students. After 3 years of operation, the school has an enrollment of only 300.

BIA officials told us they hoped their current system for setting priorities would enable them to more clearly show congressional committees BIA school construction priorities because they would have concrete needs data.

CONCLUSIONS

There is strong tribal feeling toward replacing or obtaining tribal schools regardless of the existence of available space in nearby public or other BIA schools. Such feelings could result in tribes influencing BIA and/or Members of Congress.

We believe that, if properly implemented with due regard for current BIA policies, the BIA school construction priority system should result in a realistic determination of needs. However, we found so many problems with the way this

system was implemented for the fiscal year 1979 school construction priority list, that we believe that until these problems are corrected any list developed under the system will be virtually meaningless. We found that BIA did not

--use comprehensive planning data or

--verify information submitted on construction request applications.

As a result, many schools are not ranked properly.

In addition, we believe that unless a policy on attendance boundaries is developed, setting priorities on school construction will remain extremely difficult because enrollments cannot be accurately forecasted.

RECOMMENDATIONS TO THE SECRETARY OF THE INTERIOR

We recommend that the Secretary of the Interior direct the Assistant Secretary for Indian Affairs to

--require comprehensive planning data to justify school construction priorities,

--require verification of data on all construction request applications before including them on school construction priority lists, and

--clarify and enforce BIA's policies on school attendance boundaries.

FISCAL YEAR 1979

COMMITTED PROJECTS PRIOR TO CURRENT PRIORITY LIST (note a)

Number	School	Planning stage already completed	Design stage ongoing/or already completed	Sites visited by GAO
1	Ft. Yates High School	X	X	X
2	Jemez School	X	X	X
3	Haskell Jr. College	X	X	
4	Lower Brule Secondary School	X	X	X
5	Napakiak School	X	X	
6	Kindergartens	X	X	
7	Little Wound Secondary School	X	X	
8	Tuba City Elementary Boarding School	X	X	

FISCAL YEAR 1979
BIA SCHOOL CONSTRUCTION PRIORITY LIST

Number	School	Planning stage already completed	Design stage ongoing/or already completed	Sites visited by GAO
1	Shaktoolik Elementary School	X	X	
2	Red Rock Elementary School	X	X	X
3	American Horse School	X	X	
4	Chemawa Boarding School	X	X	
5	San Felipe Elementary School	X	X	X
6	Ft. Totten School	X	X	
7	Northern Cheyenne High School	X	X	X
8	Havasupai Elementary School	X		
9	Hopi High School	X		X
10	Turtle Mountain Community School	X		
11	Alamo Elementary School	X	X	
12	Taos Elementary School			X

APPENDIX I

Number	School	Planning stage already completed	Design stage ongoing/or already completed	Sites visited by GAO
13	Bullhead School	X	X	X
14	San Simon School	X	X	X
15	Little Eagle School	X	X	X
16	Santa Clara Elementary School	X		X
17	Laguna Middle School	X	X	X
18	Canoncito Elementary School			X
19	Pinon Elementary School			
20	Torreon Elemenary School			
21	Wenahnezad Elementary School			
22	Navajo Mountain Elementary School			
23	Stewart High School Shop			
24	Wingate Elementary School	X		
25	Moenkopi Elementary School	X		X
26	Low Mountain Elementary School			
27	San Juan Elementary School	X		X
28	Salt River School	X	X	X
29	Standing Rock Elementary School	X	X	X
30	Wahpeton Elementary School			
31	Cove Elementary School			X

a/ Projects on which construction has started or is ready to start

(14580)